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Counsel for the Plaintiffs

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO,
S. DE R.L. DE C.V., *et al.*

Debtors in a Foreign Proceeding.

GONZALO GIL-WHITE, PERSONALLY
AND IN HIS CAPACITY AS FOREIGN
REPRESENTATIVE OF PERFORADORA
ORO NEGRO, S. DE R.L. DE C.V. AND
INTEGRADORA DE SERVICIOS
PETROLEROS ORO NEGRO, S.A.P.I. DE
C.V.

Plaintiff,
-against-

ALP ERCIL; ALTERNA CAPITAL
PARTNERS, LLC; AMA CAPITAL
PARTNERS, LLC; ANDRES
CONSTANTIN ANTONIUS-GONZÁLEZ;

BK Case No. 18-11094 (SCC)
(Jointly Administered) (Chapter 15)

Adversary Case No. 19-01294 (SCC)

ASIA RESEARCH AND CAPITAL MANAGEMENT LTD.; CQS (UK) LLP; FINTECH ADVISORY, INC.; DEUTSCHE BANK MÉXICO, S.A.; INSTITUCIÓN DE BANCA MÚLTIPLE; GARCÍA GONZÁLEZ Y BARRADAS ABOGADOS, S.C.; GHL INVESTMENTS (EUROPE) LTD.; JOHN FREDRIKSEN; KRISTAN BODDEN; MARITIME FINANCE COMPANY LTD.; NOEL BLAIR HUNTER COCHRANE, JR; ORO NEGRO PRIMUS PTE., LTD.; ORO NEGRO LAURUS PTE., LTD.; ORO NEGRO FORTIUS PTE., LTD.; ORO NEGRO DECUS PTE., LTD.; ORO NEGRO IMPETUS PTE., LTD.; PAUL MATISON LEAND, JR.; ROGER ALAN BARTLETT; ROGER ARNOLD HANCOCK; SEADRILL LIMITED; SHIP FINANCE INTERNATIONAL LTD.; and DOES 1-100

Defendants.

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION TO DISMISS

Plaintiffs by and through undersigned counsel,¹ hereby move for entry of an order extending the deadline for the Plaintiffs to file their response to Defendant John Fredriksen's ("Mr. Fredriksen['s]") Motion to Dismiss [ECF 44-45] (the "Motion to Dismiss"). In support of their request, the Plaintiffs state as follows:

1. Mr. Fredriksen and the Plaintiffs entered into a *Stipulated Service and Response Schedule Order*, which this Court entered on September 27, 2019 (the "Scheduling Order") [ECF 41].
2. Under the Scheduling Order, Plaintiffs' response (the "Response") to Mr.

¹ This filing is made with the express consent of José Gerardo Badín-Cherit.

Fredriksen's Motion to Dismiss is due today, November 11, 2019.

3. On Thursday, November 7, 2019, José Gerardo Badín-Cherit ("Mr. Badin") became the new liquidator (*síndico*) in the Foreign Main Proceeding.

4. Today, November 11, 2019, undersigned counsel to the current Foreign Representative spoke with Mr. Badín for the first time.

5. The Plaintiffs respectfully request, at Mr. Badín's direction, a 24-hour extension of their response date under the Scheduling Order.

6. Counsel to the Plaintiffs immediately contacted counsel to Mr. Fredriksen to seek agreement regarding this request. Counsel for Mr. Fredriksen consented to a 24-hour extension with the expectation that the parties would discuss a longer extension tomorrow, November 12, 2019.

7. The Plaintiffs do not submit this request for any improper purpose or to burden the Court. Undersigned counsel hereby certifies that there has been no previous extension of time regarding the Response.

8. To accommodate the requested extension, the deadline for Mr. Fredriksen's reply would also be extended by 24 hours. No other deadlines will be affected by the requested extension, and no party will be prejudiced by granting the relief sought herein.

WHEREFORE, the Plaintiffs request that this Court grant an extension of the deadline to file their Response until November 12, 2019.² The Plaintiffs reserve the right to seek a further extension from the Court.

² Exhibit 1 to this Motion is the proposed order granting the extension.

Dated: November 11, 2019
New York, New York

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Juan P. Morillo

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